Alberta Gaming Commission

ANNUAL REVIEW 1984

Role

The Alberta Gaming Commission, pursuant to Order In Council 124/81, is specified as the provincial authority for licencing charitable and religious organizations to conduct and manage bingos, casinos, raffles, and pull-ticket sales in accordance with section 190(1), (c), (d), (e), and (2) of the Criminal Code (see Appendix A.) The Commission is charged with the responsibility to:

1. Conduct licencing in a fair and equitable manner and, through its established hearing process, resolve all issues related to a licence application or an organization's compliance with terms and conditions of licence (see Appendix B);

2. Provide the public with information concerning the licencing and the conduct and management of gaming events; and

3. Review policies related to the licencing, conduct, and management of gaming events on a continuing basis.

The Gaming Control Branch of the Attorney General's Department assists the Commission in its role by reviewing and making recommendations concerning applications and also provides technical and professional gaming advice. The Branch is responsible for enforcing terms and conditions of gaming licences and audits required financial reports —functions essential to the effective control of gaming activities.

Membership

Donald I. Gardner
Chairman

Jo Anne Chapman
Calgary

Robert J. Giesbrecht
Lethbridge

Oliver R. Hoare
Edmonton

Murray L. Jacques
Calgary

Eric F. Jerrard
Grande Prairie

Ron G. Steele
Stony Plain

Alberta
GAMING COMMISSION

Chairman

1003 Energy Square, 10109 - 106 Street, Edmonton, Alberta, Canada T5J 1H3 403/427-9796

The Honourable Neil Crawford, Q.C.
Attorney General

Dear Mr. Crawford:

I am pleased to present the Alberta Gaming Commission's Annual Review for the year ending December 31, 1984.

Respectfully,

D.I. Gardner
Chairman

Table of Contents

REVIEW OF 1984

General 3

Bingo 3

Casino 4

Raffle 4

Pull-Tickets 4

Gaming Statistic Highlights 4

Selected Commission Cases 5

APPENDICES

A. Criminal Code 10

B. Licencing Policy Guideline 11

C. Hearings Summary 12

D. Gaming Statistics 13

Review of 1984

General

During 1984, approximately 6,700 applications for licence were received compared to 6,100 in 1983. Subsequent to the application review process, 6,403 licences were issued, a 9.9% increase from 1983. The annual total gross revenue grew to $290.7 million, an increase of 18.9%. After payment of prizes and expenses, Alberta's charitable and religious organizations retained $52.7 million to be used in support of their charitable and religious objectives. This represents a 13.7% increase over 1983.

The hearing case-load rose to 197, from 140 for the previous year, which resulted in twenty-seven days of hearings being held. The normal practice of the Commission is to hold monthly hearings in Calgary and Edmonton, one day in each city. In addition, the Commission also conducted hearings in Grande Prairie, Lethbridge, and Medicine Hat and through the hearing process was able to address a variety of issues within each community.

The continued growth in licenced gaming reflects not only increasing public participation in these activities, but also greater involvement in this form of fund-raising by charitable and religious organizations. Whatever the reasons underlying these two trends, the manner in which this growth occurs will certainly have great effect upon the nature of public gaming – an activity which involves a variety of social, regulatory, and legislative issues and concerns. With regard to the Commission's area of responsibility, a concept of "charity gaming" has developed which endeavors to achieve a reasonable balance among the various interests involved, while maintaining the intent of the relevant Criminal Code provisions. The focus of this intent is that charitable and religious organizations themselves must conduct and manage licenced gaming activities. It is the Commission's position that a licencing system based on this principle is fundamentally different from a system of gaming operating as a commercial activity. In "charity gaming" it is the volunteer community which is in charge, thus there will inherently exist a greater sensitivity and responsiveness to community needs and concerns.

Periodically, the Commission meets in executive session to consider issues related to policy implementation or development. Two days of such deliberations were held in 1984. Through this mechanism, the Commission is able to review substantive issues in light of its experience during the hearing process and the input of the Gaming Control Staff.

In the early part of 1984, the appointment of M.A. Wedekind to the Commission expired. Mr. Wedekind, appointed in 1981, was one of the original members of the Commission. This vacancy was filled with the appointment of Mrs. Jo Anne Chapman of Calgary.

Bingo

One thousand, eight hundred and fifty-eight licences were issued in 1984, an increase of 21% over 1983. Total gross revenue was $86.5 million, while net profit was $15.3 million, representing growth rates of 59.3% and 39.9% respectively. While gross revenue increased by 49.7% in Edmonton in this period, it increased by 164.1% in Calgary. This growth in Calgary reflects the development of large bingo halls, with the first opening in early 1983. Statistics being compiled on the basis of licence expiry, the financial reports of these operations were first reported for the year 1984. The growth of bingo halls was not limited to Calgary and Edmonton, but also occurred in Grande Prairie, Lethbridge and Medicine Hat. In all these cases, the Commission maintained its practice of inviting the applicants to a hearing, during which the Commission reviewed the proposed operation and assured itself that the individual charitable and religious organizations were sufficiently well organized into an association so as to ensure that bingo would be managed and conducted in accordance with licencing terms and conditions. The joining together of charitable and religious organizations in a bingo association to facilitate the co-ordination of bingo and act as the negotiating agent with commercial landlords and other interests worked effectively. As associations gained experience in bingo operations and in the practical problems of operating within the structure of an association, they strengthened their co-ordinating roles on behalf of their individual member organizations.

In recognition of the unique issues related to the conduct and management of bingo in these halls, the Commission initiated a process to revise the terms and conditions of bingo licence to better address the particulars of such operations. In co-operation with the Gaming Control Branch, a draft set of terms and conditions was developed and subsequently circulated to all bingo associations for comment. The associations, both individually and in co-operation with one another, studied the proposal and submitted their views to the Commission. On the basis of these submissions and discussions with association representatives, a revised draft was prepared for circulation and further consultation. Implementation of the revised terms and conditions was scheduled for the latter part of 1985.

Casino

Five hundred and fifty-two licences were issued in 1984, an increase of 1.5% over 1983. Total gross revenue was $92.1 million, while net profit was $10.7 million, representing growth rates of 5.7% and 0.4% respectively.

Although there were various reports of proposed casino developments in the province throughout the year, only one such proposal was submitted to the Commission in 1984. This was a submission from the Edmonton Convention Centre Authority, which requested specific changes to the current policy, yet did not seem to alter the basic structure of charity operated casinos. In reviewing the proposal with Convention Centre representatives at a hearing, the Commission identified that it incorporated elements which represented substantial changes to current policy. Significant among these were proposed increases in the number of two-day casinos allowed during each week, increases in the number of games and their betting limits, and designating a fixed number of casinos to be held within Convention Centre facilities each week. It was the Commission's view that changes should not be implemented which could significantly affect the level or nature of gaming activity or materially alter the draw system for allocating casino dates.

Raffle

Three thousand four hundred and thirteen licences were issued in 1984, a 4.1% increase over 1983. Total gross revenue was $17.9 million, while net profit was $7.9 million, representing growth rates of 4.7% and 4.4% respectively.

Although there was overall growth in raffles, the bulk of this occurred in Edmonton where the number of licences issued increased by 6% while the gross increased by 25.4%. In Calgary, the number of licences increased by 18.6%, but gross increased by only 4.9%. Outside Calgary and Edmonton, licences increased by 2% while gross actually decreased by 3.8%. Thus, the percentage of raffles in the total of all licenced gaming decreased from 7.0% in 1983 to 6.2% in 1984, reflecting the decreasing effectiveness of raffles as a means of fund-raising versus other forms of licenced gaming.

Pull-Tickets

Five hundred and eighty licences were issued in 1984, an increase of 23.7% over 1983. Total gross revenue was $94.2 million, while net profit was $18.8 million, representing growth rates of 9.6% and 9.4% respectively.

The increase in pull-ticket sales was general across the province, with the exception of Calgary, where sales declined by 2.6%. This may be connected to the fact that many community associations conduct pull-ticket sales in conjunction with bingo on their own premises. A clearer picture of these Calgary operations is gained by looking at the combined totals for both bingo and pull-tickets. On this basis, gross revenue in Calgary rose to almost $53 million, or an increase of 29.1% over 1983. The comparative figure in Edmonton was almost $54 million. Thus, with the advent of large bingo halls, there may have been some effect on pull-ticket sales, but the substantial growth in bingo revenues more than off-set the slight decline in pull-ticket sales.

The Commission will only licence an organization to sell pull-tickets on its own premises, and only in controlled circumstances. A number of proposals were received to extend sales to areas of unrestricted public access such as sporting arenas, retail malls, or hotel premises. In the Commission's view, the consequences of such proposals would be unacceptable in terms of increased levels of gaming and would create difficult control problems.

Gaming Statistic Highlights

The gaming statistics for 1984 are included in Appendix D. Below are some highlights.

Locations	Gross	Net
Edmonton	$100,091,351	$17,261,618
Calgary	100,597,026	15,194,112
Ft. McMurray	4,257,268	819,134
Gr. Prairie	2,428,300	505,639
Lethbridge	10,816,477	2,023,687
Medicine Hat	6,368,467	1,260,792
Red Deer	5,846,065	1,084,072
All Others	60,370,569	14,555,624
Totals	290,775,523	52,704,678

Selected Commission Cases

Issue: Charitable Status of Organization

Case: 84-20

Background

A society organized to assume the operating responsibility for two athletic facilities owned by a city government applied for a casino licence. The membership, comprised of 17 organizations, included sports groups, school boards, and community associations. City Council had approval authority over the society's budget, with an alderman and a representative of the city's Parks and Recreation Department holding seats on the board of directors.

Decision

Given the society's structure and its contractual obligation to operate city owned facilities, it was, in effect, an agent of city government, and, therefore, not eligible for a gaming licence.

Issue: Charitable Status of Organization

Case: 84-32

Background

A "committee" of an organization whose purpose was to support a Canadian entry into a major international sailing competition applied for a casino licence. Although the organization itself was incorporated on a not-for-profit basis under Part II of the Canada Corporation Act, the committee itself had no legal identity.

Decision

Since the "committee" was limited in membership and had no legal status in its own right, only deriving its identity from its informal relationship to the incorporated body, it was not eligible for a casino. The incorporated body, given its legal structure and the concentration of its activities in the hands of a few individuals rather than a substantial body of volunteers, was also deemed ineligible for licencing.

Issue: Use of Proceeds

Case: 84-34

Background

A service club requested to use gaming proceeds to pay operating expenses related to an annual rodeo which the club sponsors.

Decision

Gaming proceeds can be used only for charitable purposes or activities. The operating costs of a rodeo do not qualify as such. However, gaming proceeds can be used to improve or maintain a community facility, such as the rodeo grounds.

Issue: Charitable Status of Organization

Case: 84-13 and 84-36

Background

A yacht club, having been deemed ineligible for licencing, submitted a written appeal for the Commission's review. The Commission upheld the original decision, stating the group was not charitable, but rather primarily organized to support the recreational activities of its members. Subsequently, the club requested a hearing before the Commission, at which it outlined its plans to sponsor a summer sailing school and a national sailing championship.

Decision

It was held that support of an educational program, such as a sailing school, or an amateur competitive event, such as a provincial or national championship, was an eligible use of gaming proceeds and the Commission regularly licenced provincial sport governing bodies to conduct such events. However, the club's involvement in these types of activities was not so substantial as to change the nature of the club itself, which remained primarily organized for its members' benefit as opposed to some greater community service.

Issue: Use of Proceeds

Case: 84-42

Background

A province-wide nature conservation association applied to use gaming proceeds to pay for "volunteer out-of-pocket expenses" related to its members attending regular and special meetings of the association's board of directors.

Decision

Gaming proceeds cannot be used to pay "volunteer out-of-pocket expenses." Expenses incurred to plan and co-ordinate the activities of the association are considered administrative in nature, not charitable. Gaming proceeds can be used for public information or educational programs.

Issue: Use of Proceeds

Case: 84-49

Background

A medical/health organization, using casino revenues, paid expenses related to sponsoring its 1983 national congress and annual meeting. Upon review by the Gaming Control Branch, certain expenses such as air fares, meals and accommodations for attending members, translation services, and banquet costs were questioned as to whether they were eligible uses of gaming proceeds.

Decision
Expenses incurred in operating a conference, convention or meeting related to the internal administrative functions of an organization are not considered charitable activities. However, if a conference, convention or meeting provides participants with educational opportunities such as tours of research units or technical presentations, the sponsoring of these or similar activities are considered eligible uses of gaming proceeds. In addition, gaming proceeds can be used to support charitable activities outside Alberta, including medical research projects and health education.

Issue: Suitability of Sales Arrangements for Pull-Tickets

Case: 84-53

Background
An ethno-cultural organization applied to sell pull-tickets at its cultural centre which contained a bookstore, offices, and meeting rooms. It proposed to sell the tickets from a ticket booth located either in the bookstore or at the reception desk.

Decision
The organization proposed to sell pull-tickets in an area of its building open to unrestricted access by the general public. Pull-ticket sales are restricted to an organization's own premises, in an area where access is controlled by the licencee. Since the organization could not limit access to the proposed sales area, it was not eligible for licence.

Issue: Charitable Status of Organization

Case: 84-61

Background
An association of downtown business interests applied for a raffle licence, with the proceeds to be used to encourage downtown use during the winter, develop "green areas" in the downtown area, and reduce the association's debt.

Decision
This association is primarily organized "to promote, foster, and assist in any and all activities for civic welfare, improvement and advancement with particular reference to matters affecting business and properties within the more central retail business area of the city..." These activities were not considered charitable in nature and, therefore, the association was not eligible for licence.

Issue: Re-instatement of Revoked Pull-Ticket Licence

Case: 84-69

Background
It is Commission policy that, where an organization operates a facility which includes club-type premises intended for the social and recreational activities of its membership, yet provides reasonable access for the general community to other parts of the facility, only up to 50% of gaming proceeds may be used for such a facility, with the balance going to other charitable and religious objectives. In 1983, such an organization appeared before the Commission as a result of a Gaming Control Branch audit which indicated that substantially more than 50% of gaming proceeds were being used for the facility. As a result, the Commission ruled that only 25% of gaming proceeds could be used for the facility, with the balance going to other eligible objectives until such time as those funds previously diverted to the building fund were reimbursed. An investigation by Gaming Control revealed that the club had not complied with the Commission's decision and was using 100% of gaming proceeds for general operating expenses. On the basis of this investigation, the Commission revoked the organization's pull-ticket licence. Subsequently, the organization requested reinstatement of the licence.

Decision
Based on the performance of this and previous licences, the Commission felt the organization's executive had not demonstrated the ability to effectively conduct and manage pull-ticket sales. For this reason, the request was denied. Before a new licence application could be considered, the organization would have to install adequate management and financial control systems. In addition, an action plan to reimburse the over expenditure of the pull-ticket proceeds would have to be developed for approval.

Issue: Review of Large Prize Bingo Proposal

Case: 84-70

Background
A medical/health organization proposed to conduct a single bingo event with a seating capacity of 4,000 admission charge of $20 per person, and a prize payout of 65% of sales, resulting in total prizes in excess of $50,000.

Decision
If licenced, the proposed bingo program would, by its seating capacity and prize payout, be a significant increase in the level of gaming currently considered acceptable. It would intensify the competitive atmosphere in the region which would not be in the public's interest. Therefore, this type of program was not eligible for licencing.

Issue: Casino Date

Case: 84-71

Background
A foundation responsible for sponsoring a major amateur sports competition had been deemd eligible for casino licence and assigned to a 2-month period, awaiting the assignment of specific dates through the

public draw procedure. However, the foundation appealed the assigned period on the basis that the casino would be held after the sporting event, making the financial aspects of the event difficult. Therefore, it requested that they be moved to an earlier period.

Decision

Organizations are assigned to the first available casino draw period based upon date of receipt and approval of application. This is the most equitable method to assign the limited number of casino dates. To give one organization special consideration at the expense of another organization is not in the public interest. As a result, the foundation's request to be moved forward in the draw was not approved. The foundation could use proceeds from the casino to pay expenses of the competition incurred prior to the casino.

Issue: Suitable Sales Arrangements for Pull-Tickets

Case: 84-76

Background

A community association, licenced to sell pull-tickets during the regular community bingo held in its hall, applied to sell pull-tickets during a single marathon bingo to be held in an adjacent arena.

Decision

The facility in which the marathon was to be held was essentially an extension of the community hall and, as such, an eligible location to sell pull-tickets. Pull-tickets can only be sold at limited events, such as a bingo or a community social activity restricted to members and guests. They cannot be sold during hockey games or at other times when the facility is readily available to the general public. The community association would have to request amendments to their licence for each event at which they wished to sell pull-tickets in this facility.

Issue: Assignment of Casino Date

Case: 84-88

Background

A province-wide medical charity requested it be assigned specific dates for its casino. Normally, dates are assigned by public draw. The dates in question coincided with Grey Cup activities in Edmonton. Although casinos are usually limited to thirty games, as a major medical charity this organization was eligible for a fifty game casino and was the only such organization in the two month period incorporating the dates in question. It was argued that the extra games would compliment the attendant Grey Cup activities.

Decision

The Grey Cup is a recognized national event which would attract a number of visitors, resulting in a possible increase in demand for spaces at casino games. As the applicant was the only organization in the November-December 1984 period that could be licenced to conduct 50 games, on this special occasion, it was assigned Nov. 16 and 17, 1984. However, in the interest of fairness, all other organizations slotted to conduct a casino in this period were contacted with none expressing any objection to this arrangement.

Issue: Use of Proceeds

Case: 84-94

Background

A veterans' organization, licenced for the sale of pull-tickets, requested permission to pay for the construction of a fence around its property from the non-building fund portion of gaming proceeds. Since the organization maintains club-type facilities for its members' recreational and social needs, only up to 50% of gaming revenue could be used for its building fund.

Decision

The construction of the proposed fence was for the purpose of protecting the property from trespass and vandalism and, as such, clearly fell within the Commission's guidelines concerning the use of building funds. However, this use did not fall within the Commission's guidelines concerning other charitable or religious objectives or purposes, and therefore, was not eligible for disbursement from those gaming revenues identified for other charitable uses.

Issue: Eligibility to Conduct Bingo in a Bingo Hall

Case: 84-104

Background

A students' union of a city high school applied to conduct bingo as part of a bingo association which operated from a facility used exclusively for that purpose.

Decision

As the membership of a high school students' union consists primarily of minors, they were not an appropriate body to enter into the necessary contractual agreements with a bingo association. It appeared that the executive of the students' union would not be involved in the conduct and management of the bingo; rather, this would be the responsibility of adult staff members. A more suitable organization to be licenced would be a parent support group.

Issue: Use of Proceeds

Case: 84-131

Background

An organization, established to promote and support the display of visual arts, applied to use gaming proceeds to pay the salary of a curator, whose duties centered upon the professional care and display of visual art works.

Decision
Gaming proceeds can only be used to pay salaries when the skills required are an integral part of providing a community service. A curator requires special skills which cannot be reasonably provided by voluntary effort. Therefore, this was an eligible use of gaming proceeds.

Issue: Casino Eligibility

Case: 84-134

Background
A parent support group to a high school applied for a casino licence to assist in the funding of a national high school volleyball championship. A second parent group from the same high school had been licenced for a casino in the past year and was scheduled for a casino in the coming year.

Decision
A charitable or religious organization is eligible for only one public or private casino licence in any year. Where an organization has branches, subsidiaries, auxiliaries, or similar related groups, only one of either the principal organization or any related group may be eligible in any year for a casino games licence. For the purposes of casino licences, only one support group to each school is eligible for a casino licence. If more than one group exists, they are considered related, as they all support the further education and development of students, even though the activities supported may differ. Since one organization from the school had been licenced for casinos in the past and was currently slated for another casino in March-April 1985, only after the financial reports from that casino were submitted, would casino applications from other related groups be considered.

Issue: Review of Large Ticket-Value Raffle Application

Case: 84-143

Background
A newly formed historical society applied for a raffle involving 750,000 tickets at $2 each, or $1.5 million total value, the prize being a house valued at $285,000. In addition, they requested approval to pay a raffle administrator a percentage of total sales, up to a maximum of $50,000.

Decision
The society, being newly formed, had not established or delivered any programs or services for public benefit or community service. Future plans appeared to be almost entirely contingent upon gaming proceeds for their implementation. There was little involvement of residents from the local community or the surrounding district in the society, while society members resided outside the region. The proposed raffle scheme lacked an adequate ticket marketing plan, and the society did not have the financial capability of guaranteeing the awarding of the prize. Rather the prize of a house would have been available only if sufficient tickets were sold to cover its cost. For these reasons, the society was not eligible for licencing.

Issue: Review of Bingo/Pull-ticket Proposal

Case: 84-149

Background
A community association, originally licenced to conduct bingo and sell pull-tickets twice a week in the hall portion of their facility (seating 250), applied to conduct bingo and sell pull-tickets in the curling rink portion of the facility (seating 750) five times a week. In addition, they proposed to use members of other community organizations to work the bingo events, and donate to these organizations from the pull-ticket revenues.

Decision
The proposed bingo program together with the frequency of events and seating capacity in the curling facility was similar to the operation of large halls which offer bingo on an on-going basis. The Commission will not licence pull-ticket sales within these large halls. Thus, given the substantial similarity in this proposal to the operation of large halls, the Commission declined to licence the sale of pull-tickets as requested. However, if the applicant itself wished to operate bingo three times per week or less, then it would not be operating in a manner and style similar to large bingo halls, and, therefore, could be licenced to sell pull-tickets in conjunction with bingo. With respect to volunteer bingo workers, it was apparent that the applicant intended that non-members would work the bingos, with their organizations receiving part of the proceeds. It is a term and condition of licence that only members of the licenced organization can work as volunteers at bingo. In the case of the applicant, this would include the six types of members defined in its bylaws. Members of other organizations cannot work at the bingos.

Issue: Suitability of Premises for Sale of Pull-Tickets

Case: 84-162

Background
A service club, licenced to conduct bingo four times a week in a former theatre, applied to sell pull-tickets in the building while bingo was being conducted.

Decision
Pull-tickets can only be sold in an organization's own premises, which is the facility from which the organization regularly delivers its services or programs to the community. The operation of a gaming event such as bingo is not considered to be a program delivered to the community by a charitable organization. It was quite clear that the applicant primarily rented the facility for the purpose of conducting bingo. The use of the building for meetings and other limited activities was secondary in nature. As a result, the facility was not a suitable location for the sale of pull-tickets.

Issue: Casino Eligibility

Case: 84-179

Background

The alumni association of a post-secondary school applied for a private casino licence, the event to be held in conjunction with the annual national convention of a professional organization.

Decision

A private casino is one at which attendance is limited to members of the licenced organization and bona fida guests. It is restricted to one day and operates as an ancillary activity to another event, for example, a plate dinner. The casino proposed by the association did not meet this criteria. Attendance at the proposed casino would have been open to all individuals attending the convention. It was unlikely that very many of these individuals would have been members of the association. The proposed casino would be the focal point of a reception, rather than an ancillary activity. Therefore, the applicant was not eligible for a licence to conduct a private casino as applied for.

Issue: Use of Proceeds

Case: 84-182

Background

A theatrical society, licenced to conduct casinos, requested to use gaming proceeds to pay the salaries of performers.

Decision

Gaming proceeds cannot be used to pay the salary or wage costs of the professional performers or administrative staff of a performing arts company. Gaming proceeds used by performing arts organizations should be directly related to provision of space, equipment, costumes, props, etc., as required for public performances. Salaries and wage costs allowed by the Commission have been limited to those providing specific services directly related to "hands-on" program delivery such as counselling, educational, or instructional activity for members of the public.

Issue: Review of Large-Prize Bingo Proposal

Case: 84-186

Background

A support organization to a college and an athletic organization jointly applied to conduct a monthly bingo, with seating up to a maximum of 1000, tickets selling at either $100, $300, or $500 each, and prize payout being 65% of total admission.

Decision

If licenced, the proposed bingo program would, by its ticket price and prize payout, be a significant increase in the level of gaming currently considered acceptable. It would intensify the competitive atmosphere in the region, which would not be in the public interest. Therefore, the program, as applied for, was not eligible for licence.

Issue: Use of Proceeds

Case: 84-193

Background

A competitive amateur swimming association intended to use gaming proceeds to pay for a trip to a Hawaiian training camp from Dec. 7 to Jan. 7, 1985 for thirty-one swimmers and training staff. In addition, a second trip for six swimmers to a training camp in California was proposed.

Decision

The association could not use gaming proceeds to pay travel expenses to training camps in California and Hawaii. For athletic organizations, travel expenses paid from gaming proceeds must be to participate in competitive events. Travel for the purpose of training in a different venue did not meet this criteria and thus, was not an allowable use of gaming proceeds. Travelling early to a venue to acclimatize prior to a competition would be considered an eligible use of proceeds. However, the trip to Hawaii was in preparation for the Canadian National Championships which were to be held in the association's own city. Any gaming proceeds already used to pay for costs of the trip were to be refunded to the gaming account.

Issue: Charitable Status of Organization

Case: 84-195

Background

A municipal library applied for a raffle licence, the proceeds of which were to purchase books and related education materials.

Decision

The library, established by municipal bylaw with board members appointed by the local council and budget approved by council, operated as an agent or extension of the municipal government, which is not eligible for licencing. A group of volunteers, not controlled or designated by council, also wishing to support the library's activities, may be eligible for licence.

Appendix A

Excerpts* from Criminal Code of Canada
Part V, Section 190

190(1) Notwithstanding any of the provisions of this Part relating to gaming and betting, it is lawful
... (c) for a charitable or religious organization, under the authority of a licence issued by the Lieutenant Governor in Council of a province or by such other person or authority in the province as may be specified by the Lieutenant Governor in Council thereof, to conduct and manage a lottery scheme in that province and for that purpose for any person under the authority of such licence to do any thing described in any of paragraphs 189(1) (a) to (g) or subsection 189(4), otherwise that in relation to a dice game, three-card monte, punch board or coin table, if

(i) the proceeds from the lottery scheme are used for a charitable or religious object or purpose, and
(ii) in the case of a lottery scheme conducted by the charitable or religious organization at a bazaar,

(A) the amount or value of each prize awarded does not exceed one hundred dollars, and
(B) the money or other valuable consideration paid to secure a chance to win a prize does not exceed fifty cents;

(d) for an agricultural fair or exhibition or an operator of a concession leased by an agricultural fair or exhibition board, under the authority of a licence issued by the Lieutenant Governor in Council of a province or by such other person or authority in the province as may be specified by the Lieutenant Governor in Council thereof, to conduct and manage a lottery scheme in that province and for that purpose for any person under the authority of such licence to do any thing described in any of paragraphs 189(1)(a) to (f) or subsection 189(4);
(e) for any person, under the authority of a licence issued by the Lieutenant Governor in Council of a province or by such other person or authority in the province as may be specified by the Lieutenant Governor in Council thereof, to conduct and manage a lottery scheme at a public place of amusement in the province and for that purpose for any person under the authority of such licence to do any thing described in any of paragraphs 189(1)(a) to (g) or subsection 189(4), otherwise than in relation to a dice game, three-card monte, punch board or coin table, if

(i) the amount or value of each prize awarded does not exceed one hundred dollars, and
(ii) the money or other valuable consideration paid to secure a chance to win a prize does not exceed fifty cents; and ...

(2) Subject to this Act, a licence issued by or under the authority of the Lieutenant Governor in Council of a province as described in paragraph (1)(c), (d) or (e) or subsection (1.1) may contain such terms and conditions relating to the conduct and management of the lottery scheme to which the licence relates as the Lieutenant Governor in Council of that province or the person or authority in the province designated by him may prescribe...

(5) In this section "lottery scheme" includes a game.

* Defining the authority of The Alberta Gaming Commission for the licencing of lottery schemes in the province of Alberta.

Appendix B

Alberta Gaming Commission
Licencing Policy Guideline
(The Alberta Gazette, May 15, 1981)

1(1) In this guideline

(a) "Commission" means the Alberta Gaming Commission;
(b) "fair" means an agricultural fair or exhibition;
(c) "Gaming Control Branch" means the Gaming Control Branch of the Department of the Attorney General;
(d) "lottery scheme" includes bingos, raffles, pull-ticket lotteries and casino games;
(e) "organization" means a charitable or religious organization;
(f) "prescribed" means prescribed by the Commission.

(2) An organization or fair wishing to conduct a lottery scheme shall submit an Application in the prescribed form to the Commission.

(3) The Commission shall forward the Application to the Gaming Control Branch and an employee in the Gaming Control Branch designated by the Chief Inspector of the Branch shall, on receipt of the Application, review the Application, and, if he considers it necessary, conduct an investigation regarding the advisability of issuing a Licence and make a recommendation and report in that regard to the Commission.

(4) The Commission, on receiving a recommendation and report and on reviewing the Application shall

(a) issue the Licence, and may make the Licence subject to any terms and conditions it considers appropriate, or
(b) if it appears to the Commission that there is cause for concern as to whether a Licence should be issued, set a date for a hearing on the matter.

(5) The Commission may, before acting under subsection (4) request other information from the Gaming Control Branch and the applicant.

(6) The Commission shall give notice in writing of the hearing to the Gaming Control Branch and the applicant, and the notice shall

(a) set out with sufficient clarity the basis on which the Commission feels there is cause for concern as to whether the applicant should be issued a Licence, and
(b) set out the time and place for the hearing.

(7) Notice of the hearing shall be served on the applicant and the Gaming Control Branch either personally or by certified mail addressed to the applicant or the Gaming Control Branch at the address shown on the Application.

(8) At the hearing the employee in the Gaming Control Branch referred to in subsection (3) and the applicant are entitled to

(a) be present,
(b) make representations in respect of the Application orally and in writing, and
(c) be represented by counsel.

(9) A hearing shall be open to the public unless the Commission feels that it is advisable that all or part of the hearing be held in camera, in which case it may so direct.

(10) After considering the representations of the parties and any other evidence it considers appropriate the Commission shall

(a) issue the Licence, and may make the Licence subject to any terms and conditions it considers appropriate, or
(b) refuse to issue the Licence.

(11) If the Commission refuses to issue the Licence it shall give written reasons for doing so and serve those reasons on the applicant and the Gaming Control Branch in the manner provided in subsection (7).

(12) A Licence issued by the Commission is subject to the terms and conditions on it or attached to and forming part of it, and to any further terms and conditions made by the Commission from time to time.

2(1) No licence fee is payable in respect of a Bingo Licence or a Raffle Licence.

(2) The licence fee payable in respect of

(a) a Pull Ticket Licence is an amount equal to one per cent of the product of the estimated number of units times the gross revenue per unit,
(b) a Casino Licence issued to an organization is an amount equal to the product of $10 times the number of games times the number of days the Casino operates, and
(c) a Casino Licence issued to a fair is an amount equal to the product of $25 times the number of games times the number of days the Casino operates.

Appendix C

HEARINGS SUMMARY	1982	1983	1984
CASE-LOAD FOR HEARINGS			
Decisions	113	131	184
Applications Withdrawn	N/A	2	7
Deferred Decisions	N/A	9	3
TOTAL	**113**	**142**	**194**
TYPES OF ISSUES			
Charitable status of organizations	64	71	87
Suitable use of proceeds	42	27	49
Eligibility for casino licence	5	12	14
Issues related to terms and conditions of licence	18	21	45
Review of large ticket value raffles	—	5	1
Review of proposed bingo associations	—	10	16
Issues related to registration status, casino personnel	3	4	3
TOTAL NUMBER OF CASES REVIEWED*	**113**	**140**	**187**

*Not equal to sum of issues, as each case may involve more than one issue.

DECISIONS FOLLOWING HEARINGS*			
Licences approved			
Bingo	21	172	215
Casino	29	25	28
Raffle	17	27	32
Pull-Ticket	7	4	8
TOTAL	**74**	**228**	**283**
Licences not approved			
Bingo	13	15	33
Casino	17	18	19
Raffle	17	17	18
Pull-Ticket	25	7	10
TOTAL	**72**	**57**	**80**
Policy Issues			
Approved	1	1	0
Not Approved	1	0	1
TOTAL	**2**	**1**	**1**
Casino Staff Registration			
Approved	2	1	—
Not Approved	1	3	3
TOTAL	**3**	**4**	**3**

*Not equal to sum of cases reviewed as each case may involve more than one licence.

Appendix D

GAMING STATISTICS

(Compiled by Audit Section, Gaming Control Branch, Department of the Attorney General)

TABLE 1

TOTALS OF ALL LICENCED GAMING 1982 - 1984

	Licences	Events*	Licence Fees	Total Gross	Prizes/Winnings	%	Expenses	%	Net Profit	%
1982			$	$	$		$		$	
Bingo	1,391	29,933	—	47,502,004	32,411,879	68.2	4,370,218	9.2	10,719,907	22.6
Casino	483	961	308,200	79,727,496	61,843,534	77.6	7,446,985	9.3	10,436,977	13.1
Raffle	2,735	6,838	24,550	14,677,187	6,062,832	41.3	1,745,431	11.9	6,868,924	46.8
Pull Ticket	377	377	817,771	79,360,303	58,630,668	73.9	4,715,077	5.9	16,014,558	20.2
TOTAL	**4,986**	**38,109**	**1,150,521**	**221,266,990**	**158,948,913**	**71.8**	**18,277,711**	**8.3**	**44,040,366**	**19.9**
1983										
Bingo	1,536	32,345	—	54,310,548	37,941,009	69.8	5,415,060	10.0	10,954,479	20.2
Casino	544	1,086	330,540	87,168,224	67,751,003	77.7	8,754,891	10.1	10,662,330	12.2
Raffle	3,277	8,146	23,350	17,125,752	7,388,158	43.1	2,188,789	12.8	7,548,805	44.1
Pull Ticket	469	469	858,261	85,957,080	63,595,823	74.0	5,169,899	6.0	17,191,358	20.0
TOTAL	**5,826**	**42,046**	**1,212,151**	**244,561,604**	**176,675,993**	**72.2**	**21,528,639**	**8.8**	**46,356,972**	**19.0**
1984										
Bingo	1,858	37,158	100	86,526,008	60,717,483	70.2	10,485,739	12.1	15,322,786	17.7
Casino	552	1,108	347,930	92,104,459	72,154,429	78.3	9,251,341	10.1	10,698,689	11.6
Raffle	3,413	9,807	20,550	17,938,091	7,676,949	42.8	2,377,213	13.2	7,883,929	44.0
Pull Ticket	580	580	946,495	94,206,965	69,726,063	74.0	5,681,628	6.0	18,799,274	20.0
TOTAL	**6,403**	**48,653**	**1,315,075**	**290,775,523**	**210,274,924**	**72.3**	**27,795,921**	**9.6**	**52,704,678**	**18.1**

*For bingo, this represents the number of sessions; for casino, the number of days; for raffles, the number of draw dates, and for pull-tickets, the number of licences.

TABLE 2

LICENCED BINGOS 1982 - 1984

	Licences	Events	Licence Fees*	Total Gross	Prizes/Winnings	%	Expenses	%	Net Profit	%
1982			$	$	$		$		$	
Edmonton	386	7,489	—	25,896,476	17,549,826	67.8	2,654,218	10.2	5,692,423	22.0
Calgary	111	5,729	—	8,069,329	5,973,203	74.0	725,715	9.0	1,370,411	17.0
Others	894	16,715	—	13,536,199	8,888,850	65.7	990,285	7.3	3,657,064	27.0
TOTAL	**1,391**	**29,933**	**—**	**47,502,004**	**32,411,879**	**68.2**	**4,370,218**	**9.2**	**10,719,907**	**22.6**
1983										
Edmonton	398	7,838	—	27,613,210	19,071,433	69.1	3,060,598	11.1	5,481,179	19.8
Calgary	120	6,009	—	7,813,792	6,171,185	79.0	643,571	8.2	999,036	12.8
Others	1,018	18,498	—	18,883,546	12,698,391	67.2	1,710,891	9.1	4,474,264	23.7
TOTAL	**1,536**	**32,345**	**—**	**54,310,548**	**37,941,009**	**69.8**	**5,415,060**	**10.0**	**10,954,479**	**20.2**
1984										
Edmonton	607	9,122	100	41,344,544	28,756,417	69.6	5,136,748	12.4	7,451,379	18.0
Calgary	179	8,119	—	20,636,464	15,221,287	73.8	3,056,894	14.8	2,358,283	11.4
Others	1,072	19,917	—	24,545,000	16,739,779	68.2	2,292,097	9.3	5,513,124	22.5
TOTAL	**1,858**	**37,158**	**100**	**86,526,008**	**60,717,483**	**70.2**	**10,485,739**	**12.1**	**15,322,786**	**17.7**

* For agricultural fairs and exhibition boards only.

TABLE 3

LICENCED CASINOS 1982 - 1984

	Licences	Events	Licence Fees	Total Gross*	Prizes/Winnings	%	Expenses	%	Net Profit	%
1982			$	$	$		$		$	
Edmonton	191	386	142,350	36,289,408	27,937,689	77.0	3,133,581	8.6	5,218,138	14.4
Calgary	171	348	132,230	39,444,490	31,080,445	78.8	3,661,489	9.3	4,702,556	11.9
Others	121	227	33,620	3,993,598	2,825,400	70.7	651,915	16.3	516,283	13.0
TOTAL	**483**	**961**	**308,200**	**79,727,496**	**61,843,534**	**77.6**	**7,446,985**	**9.3**	**10,436,977**	**13.1**
1983										
Edmonton	193	390	143,230	39,918,711	30,804,662	77.2	3,564,946	8.9	5,549,103	13.9
Calgary	187	381	142,100	41,233,183	32,486,057	78.8	4,213,022	10.2	4,534,104	11.0
Others	164	315	45,210	6,016,330	4,460,284	74.1	976,923	16.2	579,123	9.7
TOTAL	**544**	**1,086**	**330,540**	**87,168,224**	**67,751,003**	**77.7**	**8,754,891**	**10.1**	**10,662,330**	**12.2**
1984										
Edmonton	196	396	145,650	41,138,480	32,016,640	77.8	3,665,553	8.9	5,456,287	13.2
Calgary	194	395	152,150	43,973,586	34,873,889	79.3	4,520,315	10.3	4,579,382	10.4
Others	162	317	50,130	6,992,393	5,263,900	75.3	1,065,473	15.2	663,020	9.5
TOTAL	**552**	**1,108**	**347,930**	**92,104,459**	**72,154,429**	**78.3**	**9,251,341**	**10.1**	**10,698,689**	**11.6**

*For casinos, "gross" equals "drop" — the total of money spent to purchase chips.

TABLE 4

LICENCED PULL-TICKETS 1982 - 1984

	Licences	Events	Licence Fees	Total Gross	Prizes/Winnings	%	Expenses	%	Net Profit	%
1982			$	$	$		$		$	
Edmonton	14		108,975	10,734,984	8,028,606	74.8	658,540	6.1	2,047,838	19.1
Calgary	111		341,187	32,782,670	24,081,626	73.4	1,828,524	5.6	6,872,520	21.0
Others	252		367,609	35,842,649	26,520,436	74.0	2,228,013	6.2	7,094,200	19.8
TOTAL	**377**	**—**	**817,771**	**79,360,303**	**58,630,668**	**73.9**	**4,715,077**	**5.9**	**16,014,558**	**20.2**
1983										
Edmonton	21		114,128	11,603,853	8,662,040	74.6	719,024	6.2	2,222,789	19.2
Calgary	126		329,605	33,232,886	24,421,999	73.5	1,950,938	5.9	6,859,949	20.6
Others	322		414,528	41,120,341	30,511,784	74.2	2,499,937	6.1	8,108,620	19.7
TOTAL	**469**	**—**	**858,261**	**85,957,080**	**63,595,823**	**74.0**	**5,169,899**	**6.0**	**17,191,358**	**20.0**
1984										
Edmonton	37		126,668	12,627,507	9,420,490	74.6	785,749	6.2	2,421,268	19.2
Calgary	134		324,294	32,352,378	23,713,875	73.3	1,925,757	6.0	6,712,746	20.7
Others	409		495,533	49,227,080	36,591,698	74.3	2,970,122	6.1	9,665,260	19.6
TOTAL	**580**	**—**	**946,495**	**94,206,965**	**69,726,063**	**74.0**	**5,681,628**	**6.0**	**18,799,274**	**20.0**

TABLE 5

LICENCED RAFFLES 1982 - 1984

	Licences	Events	Licence Fees*	Total Gross	Prizes/Winnings	%	Expenses	%	Net Profit	%
1982			$	$	$		$		$	
Edmonton	424	1,221	7,600	2,699,858	1,100,032	40.7	441,827	16.4	1,157,999	42.9
Calgary	272	1,153	13,000	3,549,762	1,204,882	33.9	535,582	15.1	1,809,298	51.0
Others	2,039	4,464	3,950	8,427,567	3,757,918	44.6	768,022	9.1	3,901,627	46.3
TOTAL	**2,735**	**6,838**	**24,550**	**14,677,187**	**6,062,832**	**41.3**	**1,745,431**	**11.9**	**6,868,924**	**46.8**
1983										
Edmonton	491	1,292	7,600	3,972,974	1,619,193	40.8	517,256	13.0	1,836,525	46.2
Calgary	307	1,433	10,600	3,464,510	1,373,640	39.6	646,394	18.7	1,444,476	41.7
Others	2,479	5,421	5,150	9,688,268	4,395,325	45.4	1,025,139	10.6	4,267,804	44.0
TOTAL	**3,277**	**8,146**	**23,350**	**17,125,752**	**7,388,158**	**43.1**	**2,188,789**	**12.8**	**7,548,805**	**44.1**
1984										
Edmonton	521	1,251	7,700	4,980,820	2,284,280	45.9	763,856	15.3	1,932,684	38.8
Calgary	364	2,801	10,600	3,634,598	1,347,580	37.1	743,317	20.4	1,543,701	42.5
Others	2,528	5,755	2,250	9,322,673	4,045,089	43.4	870,040	9.3	4,407,544	47.3
TOTAL	**3,413**	**9,807**	**20,550**	**17,938,091**	**7,676,949**	**42.8**	**2,377,213**	**13.2**	**7,883,929**	**44.0**

*For agricultural fairs and exhibition boards only.

TABLE 6

REGIONAL BREAKDOWN ALL LICENCED GAMING 1984

	Licences	Events	Licence Fees	Total Gross	Prizes/Winnings	%	Expenses	%	Net Profit	%
			$	$	$		$		$	
Edmonton										
Bingo	607	9,122	100	41,344,544	28,756,417	69.6	5,136,748	12.4	7,451,379	18.0
Casino	196	396	145,650	41,138,480	32,016,640	77.8	3,665,553	8.9	5,456,287	13.3
Raffle	521	1,251	7,700	4,980,820	2,284,280	45.9	763,856	15.3	1,932,684	38.8
Pull Ticket	37	37	126,668	12,627,507	9,420,490	74.6	785,749	6.2	2,421,268	19.2
TOTAL	**1,361**	**10,806**	**280,118**	**100,091,351**	**72,477,827**	**72.4**	**10,351,906**	**10.3**	**17,261,618**	**17.3**
Calgary										
Bingo	179	8,119	—	20,636,464	15,221,287	73.8	3,056,894	14.8	2,358,283	11.4
Casino	194	395	152,150	43,973,586	34,873,889	79.3	4,520,315	10.3	4,579,382	10.4
Raffle	364	2,801	10,600	3,634,598	1,347,580	37.1	743,317	20.4	1,543,701	42.5
Pull Ticket	134	134	324,294	32,352,378	23,713,875	73.3	1,925,757	6.0	6,712,746	20.7
TOTAL	**871**	**11,449**	**487,044**	**100,597,026**	**75,156,631**	**74.7**	**10,246,283**	**10.2**	**15,194,112**	**15.1**
Ft. McMurray										
Bingo	16	448	—	1,314,929	943,136	71.7	115,351	8.8	256,442	19.5
Casino	23	48	5,520	999,292	742,808	74.4	144,225	14.4	112,259	11.2
Raffle	46	59	—	219,917	80,515	36.6	11,593	5.3	127,809	58.1
Pull Ticket	6	6	17,254	1,723,130	1,314,280	76.3	86,226	5.0	322,624	18.7
TOTAL	**91**	**561**	**22,774**	**4,257,268**	**3,080,739**	**72.4**	**357,395**	**8.4**	**819,134**	**19.2**
Grande Prairie										
Bingo	14	348	—	378,858	269,488	71.1	38,415	10.2	70,955	18.7
Casino	4	10	1,060	119,606	83,838	70.1	26,204	21.9	9,564	8.0
Raffle	54	80	—	279,352	143,877	51.5	35,818	12.8	99,657	35.7
Pull Ticket	11	11	16,629	1,650,484	1,219,244	73.9	105,777	6.4	325,463	19.7
TOTAL	**83**	**449**	**17,689**	**2,428,300**	**1,716,447**	**70.7**	**206,214**	**8.5**	**505,639**	**20.8**
Lethbridge										
Bingo	27	1,110	—	1,098,531	783,639	71.3	84,357	7.7	230,535	21.0
Casino	7	18	7,010	802,709	625,085	77.9	135,784	16.9	41,840	5.2
Raffle	66	160	450	423,905	210,728	49.7	45,207	10.7	167,970	39.6
Pull Ticket	16	16	85,093	8,491,332	6,387,420	75.2	520,570	6.1	1,583,342	18.7
TOTAL	**116**	**1,304**	**92,553**	**10,816,477**	**8,006,872**	**74.0**	**785,918**	**7.3**	**2,023,687**	**18.7**
Medicine Hat										
Bingo	11	610	—	651,875	495,030	75.9	56,389	8.7	100,456	15.4
Casino	13	30	7,080	1,177,894	836,332	71.0	170,561	14.5	171,001	14.5
Raffle	65	286	850	412,637	204,351	49.5	22,467	5.5	185,819	45.0
Pull Ticket	11	11	41,311	4,126,061	3,036,584	73.6	285,961	6.9	803,516	19.5
TOTAL	**100**	**937**	**49,241**	**6,368,467**	**4,572,297**	**71.8**	**535,378**	**8.4**	**1,260,792**	**19.8**
Red Deer										
Bingo	30	778	—	1,474,570	1,102,830	74.8	175,941	11.9	195,799	13.3
Casino	11	26	8,490	954,570	713,684	74.7	157,108	16.5	83,778	8.8
Raffle	76	271	—	554,353	268,621	48.5	65,943	11.9	219,789	39.6
Pull Ticket	7	7	28,626	2,862,572	2,121,180	74.1	156,686	5.5	584,706	20.4
TOTAL	**124**	**1,082**	**37,116**	**5,846,065**	**4,206,315**	**72.0**	**555,678**	**9.5**	**1,084,072**	**18.5**
All Other										
Bingo	974	16,623	—	19,626,237	13,145,656	67.0	1,821,644	9.3	4,658,937	23.7
Casino	104	185	20,970	2,938,322	2,262,153	77.0	431,591	14.7	244,578	8.3
Raffle	2,221	4,899	950	7,432,509	3,136,997	42.2	689,012	9.3	3,606,500	48.5
Pull Ticket	358	358	306,620	30,373,501	22,512,990	74.1	1,814,902	6.0	6,045,609	19.9
TOTAL	**3,657**	**22,065**	**328,540**	**60,370,569**	**41,057,796**	**68.0**	**4,757,149**	**7.9**	**14,555,624**	**24.1**

TABLE 7

REGIONAL BREAKDOWN — % OF PROVINCIAL TOTAL
1984

AREA	Licences		Events		Licence Fees		Gross		Prizes/Winnings		Expenses		Net Profit	
	No.	%	No.	%	$	%	$	%	$	%	$	%	$	%
Edmonton	1,361	21.3	10,806	22.2	280,118	21.3	100,091,351	34.4	72,477,827	34.5	10,351,906	37.2	17,261,618	32.8
Calgary	871	13.6	11,449	23.5	487,044	37.0	100,597,026	34.6	75,156,631	35.7	10,246,283	36.9	15,194,112	28.8
Ft. McMurray	91	1.4	561	1.2	22,774	1.7	4,257,268	1.5	3,080,739	1.5	357,395	1.3	819,134	1.6
Gr. Prairie	83	1.3	449	0.9	17,689	1.4	2,428,300	0.8	1,716,447	0.8	206,214	0.8	505,639	1.0
Lethbridge	116	1.8	1,304	2.7	92,553	7.0	10,816,477	3.7	8,006,872	3.8	785,918	2.8	2,023,687	3.8
Medicine Hat	100	1.6	937	1.9	49,241	3.8	6,368,467	2.2	4,572,297	2.2	535,378	1.9	1,260,792	2.4
Red Deer	124	1.9	1,082	2.2	37,116	2.8	5,846,065	2.0	4,206,315	2.0	555,678	2.0	1,084,072	2.0
All Other	3,657	57.1	22,065	45.4	328,540	25.0	60,370,569	20.8	41,057,796	19.5	4,757,149	17.1	14,555,624	27.6
TOTAL	**6,403**	**100.0**	**48,653**	**100.0**	**1,315,075**	**100.0**	**290,775,523**	**100.0**	**210,274,924**	**100.0**	**27,795,921**	**100.0**	**52,704,678**	**100.0**

TABLE 8

BINGOS
REGIONAL BREAKDOWN 1984

AREA	Licences		Events		Licence Fees		Gross		Prizes/Winnings		Expenses		Net Profit	
	No.	%	No.	%	$	%	$	%	$	%	$	%	$	%
Edmonton	607	32.7	9,122	24.6	100.0	100.0	41,344,544	47.8	28,756,417	47.4	5,136,748	49.0	7,451,379	48.6
Calgary	179	9.6	8,119	21.6	—	—	20,636,464	23.8	15,221,287	25.1	3,056,894	29.1	2,358,283	15.4
Ft. McMurray	16	0.9	448	1.2	—	—	1,314,929	1.5	943,136	1.5	115,351	1.1	256,442	1.7
Gr. Prairie	14	0.8	348	0.9	—	—	378,858	0.4	269,488	0.4	38,415	0.4	70,955	0.5
Lethbridge	27	1.4	1,110	3.0	—	—	1,098,531	1.3	783,639	1.3	84,357	0.8	230,535	1.5
Medicine Hat	11	0.6	610	1.6	—	—	651,875	0.8	495,030	0.8	56,389	0.5	100,456	0.6
Red Deer	30	1.6	778	2.1	—	—	1,474,570	1.7	1,102,830	1.8	175,941	1.7	195,799	1.3
All Other	974	52.4	16,623	44.7	—	—	19,626,237	22.7	13,145,656	21.7	1,821,644	17.4	4,658,937	30.4
TOTAL	**1,858**	**100.0**	**37,158**	**100.0**	**100.0**	**100.0**	**86,526,008**	**100.0**	**60,717,483**	**100.0**	**10,485,739**	**100.0**	**15,322,786**	**100.0**

TABLE 9

CASINOS
REGIONAL BREAKDOWN 1984

AREA	Licences		Events		Licence Fees		Gross*		Prizes/Winnings		Expenses		Net Profit	
	No.	%	No.	%	$	%	$	%	$	%	$	%	$	%
Edmonton	196	35.5	396	35.7	145,650	41.9	41,138,480	44.7	32,016,640	44.4	3,665,553	39.6	5,456,287	51.0
Calgary	194	35.1	395	35.7	152,150	43.7	43,973,586	47.7	34,873,889	48.3	4,520,315	48.9	4,579,382	42.8
Ft. McMurray	23	4.2	48	4.3	5,520	1.6	999,292	1.1	742,808	1.0	144,225	1.5	112,259	1.0
Gr. Prairie	4	0.7	10	0.9	1,060	0.3	119,606	0.1	83,838	0.1	26,204	0.3	9,564	0.1
Lethbridge	7	1.3	18	1.6	7,010	2.0	802,709	0.9	625,085	0.9	135,784	1.5	41,840	0.4
Medicine Hat	13	2.4	30	2.7	7,080	2.0	1,177,894	1.3	836,332	1.2	170,561	1.8	171,001	1.6
Red Deer	11	2.0	26	2.4	8,490	2.5	954,570	1.0	713,684	1.0	157,108	1.7	83,778	0.8
All Other	104	18.8	185	16.7	20,970	6.0	2,938,322	3.2	2,262,153	3.1	431,591	4.7	244,578	2.3
TOTAL	**552**	**100.0**	**1,108**	**100.0**	**347,930**	**100.0**	**92,104,459**	**100.0**	**72,154,429**	**100.0**	**9,251,341**	**100.0**	**10,698,689**	**100.0**

*For casinos, "gross" equals "drop" — the total of money spent to purchase chips.

TABLE 10

PULL-TICKETS
REGIONAL BREAKDOWN 1984

AREA	Licences		Events		Licence Fees		Gross		Prizes/Winnings		Expenses		Net Profit	
	No.	%	No.	%	$	%	$	%	$	%	$	%	$	%
Edmonton	37	6.4	37	6.4	126,668	13.4	12,627,507	13.4	9,420,490	13.5	785,749	13.8	2,421,268	12.9
Calgary	134	23.1	134	23.1	324,294	34.3	32,352,378	34.4	23,713,875	34.0	1,925,757	33.9	6,712,746	35.7
Ft. McMurray	6	1.0	6	1.0	17,254	1.8	1,723,130	1.8	1,314,280	1.9	86,226	1.5	322,624	1.7
Gr. Prairie	11	1.9	11	1.9	16,629	1.7	1,650,484	1.7	1,219,244	1.7	105,777	1.9	325,463	1.7
Lethbridge	16	2.8	16	2.8	85,093	9.0	8,491,322	9.0	6,387,420	9.2	520,570	9.2	1,583,342	8.4
Medicine Hat	11	1.9	11	1.9	41,311	4.4	4,126,061	4.4	3,036,584	4.4	285,961	5.0	803,516	4.3
Red Deer	7	1.2	7	1.2	28,626	3.0	2,862,572	3.0	2,121,180	3.0	156,686	2.8	584,706	3.1
All Other	358	61.7	358	61.7	306,620	32.4	30,373,501	32.3	22,512,990	32.3	1,814,902	31.9	6,045,609	32.2
TOTAL	**580**	**100.0**	**580**	**100.0**	**946,495**	**100.0**	**94,206,965**	**100.0**	**69,726,063**	**100.0**	**5,681,628**	**100.0**	**18,799,274**	**100.0**

TABLE 11

RAFFLES
REGIONAL BREAKDOWN 1984

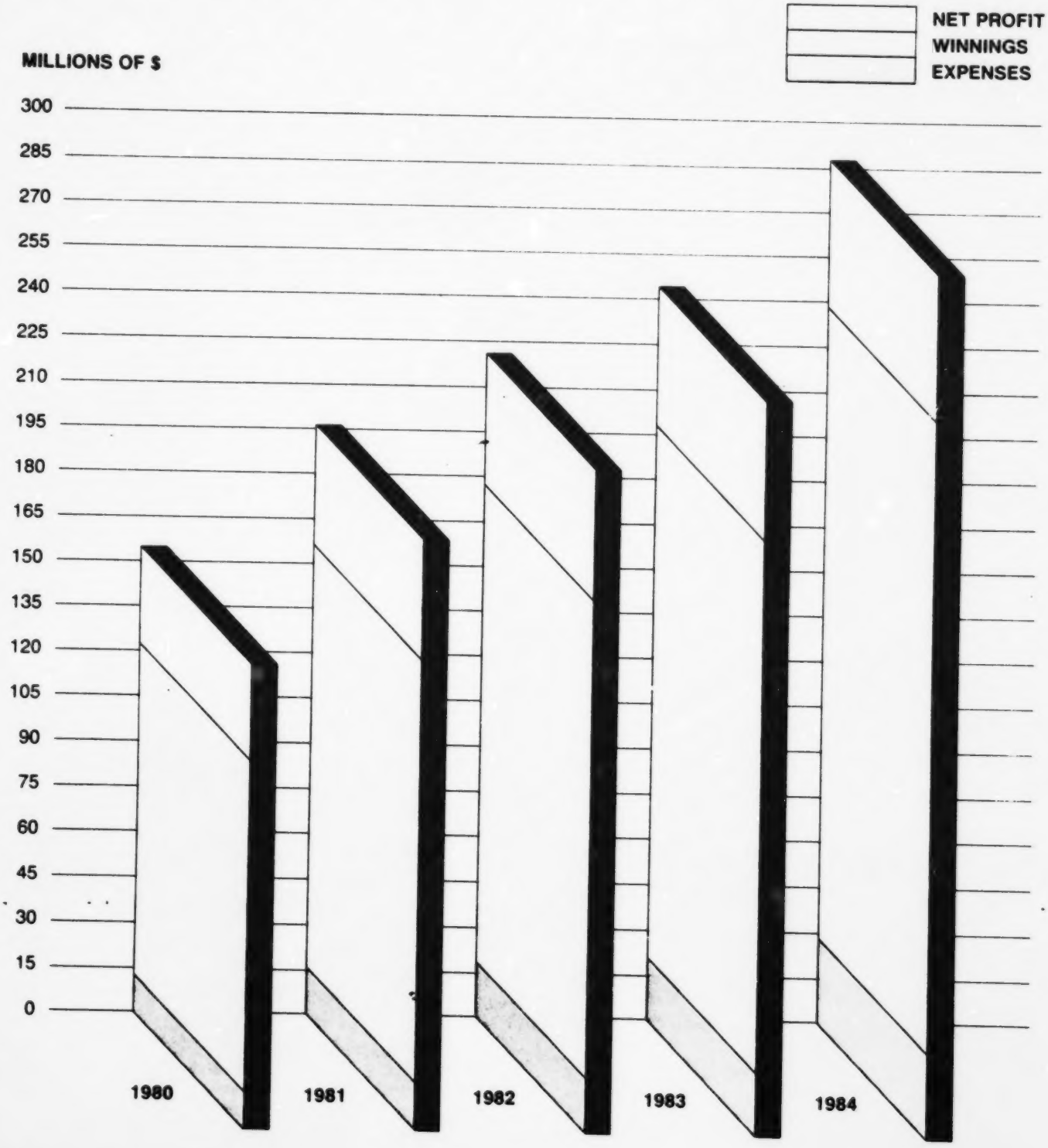
AREA	Licences		Events		Licence Fees*		Gross		Prizes/Winnings		Expenses		Net Profit	
	No.	%	No.	%	$	%	$	%	$	%	$	%	$	%
Edmonton	521	15.3	1,251	12.8	7,700	37.5	4,980,820	27.8	2,284,280	29.7	763,856	32.1	1,932,684	24.5
Calgary	364	10.7	2,801	28.6	10,600	51.6	3,634,598	20.2	1,347,580	17.6	743,317	31.3	1,543,701	19.6
Ft. McMurray	46	1.3	59	0.6	—	—	219,917	1.2	80,515	1.0	11,593	0.5	127,809	1.6
Gr. Prairie	54	1.6	80	0.8	—	—	279,352	1.6	143,877	1.9	35,818	1.5	99,657	1.3
Lethbridge	66	1.9	160	1.6	450	2.2	423,905	2.4	210,728	2.7	45,207	1.9	167,970	2.1
Medicine Hat	65	1.9	286	2.9	850	4.1	412,637	2.3	204,351	2.7	22,467	0.9	185,819	2.4
Red Deer	76	2.2	271	2.8	—	—	554,353	3.1	268,621	3.5	65,943	2.8	219,789	2.8
All Other	2,221	65.1	4,899	49.9	950	4.6	7,432,509	41.4	3,136,997	40.9	689,012	29.0	3,606,500	45.7
TOTAL	**3,413**	**100.0**	**9,807**	**100.0**	**20,550**	**100.0**	**17,938,091**	**100.0**	**7,676,949**	**100.0**	**2,377,213**	**100.0**	**7,883,929**	**100.0**

*For agricultural fairs and exhibition boards only.

GRAPH 1

All Licenced Gaming

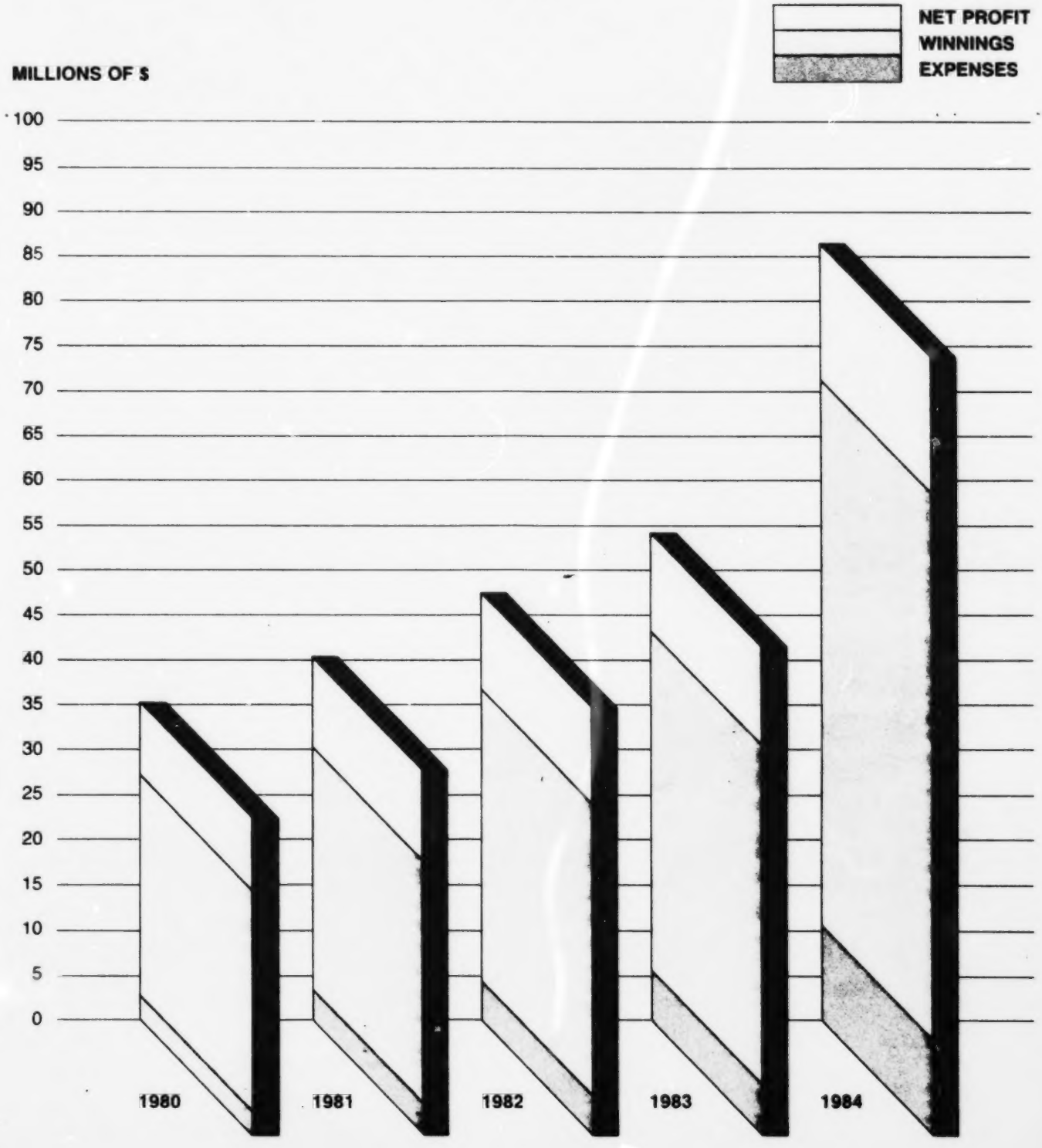
1980-1984



GRAPH 2

Bingos

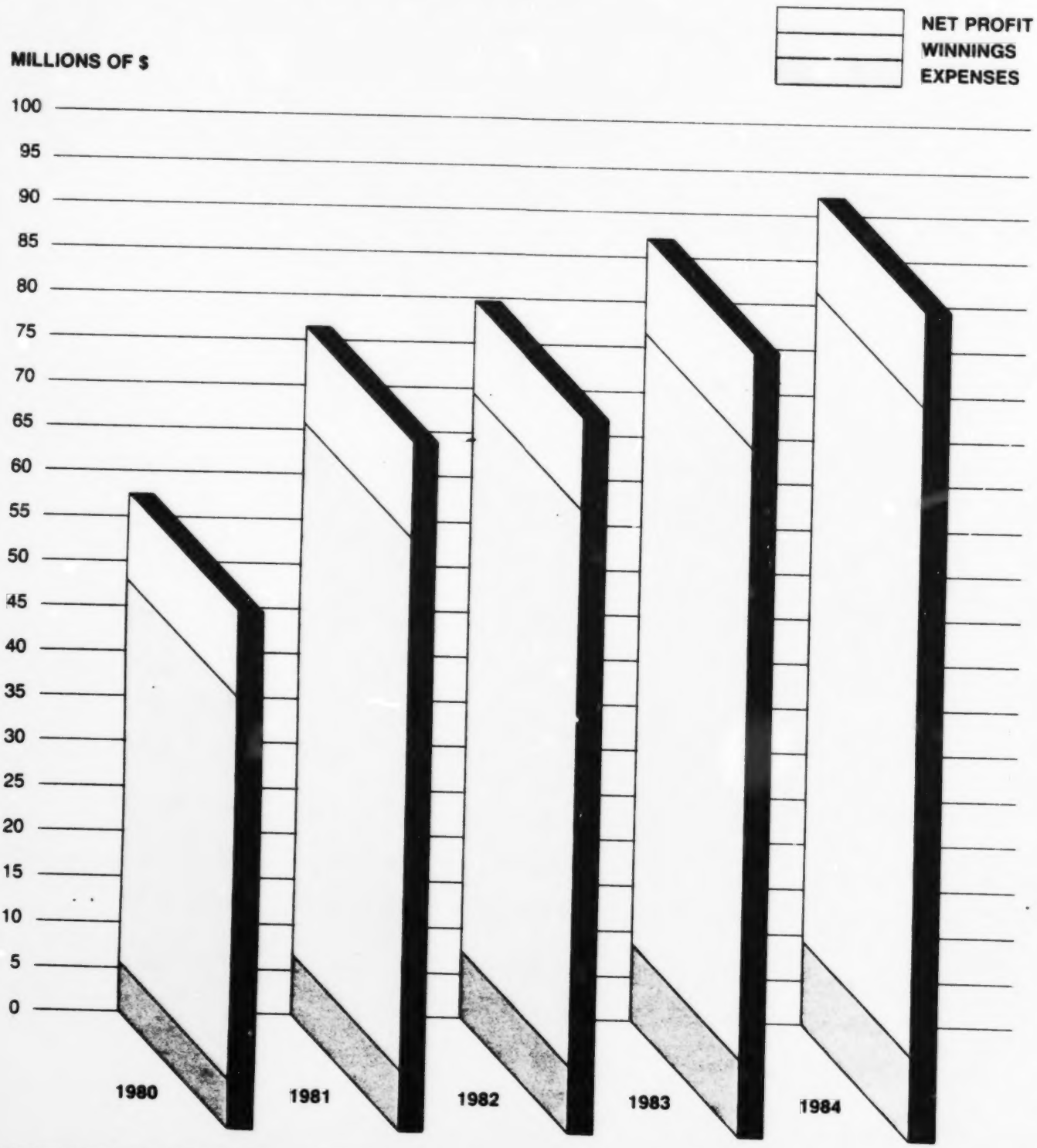
1980-1984



GRAPH 3

Casinos

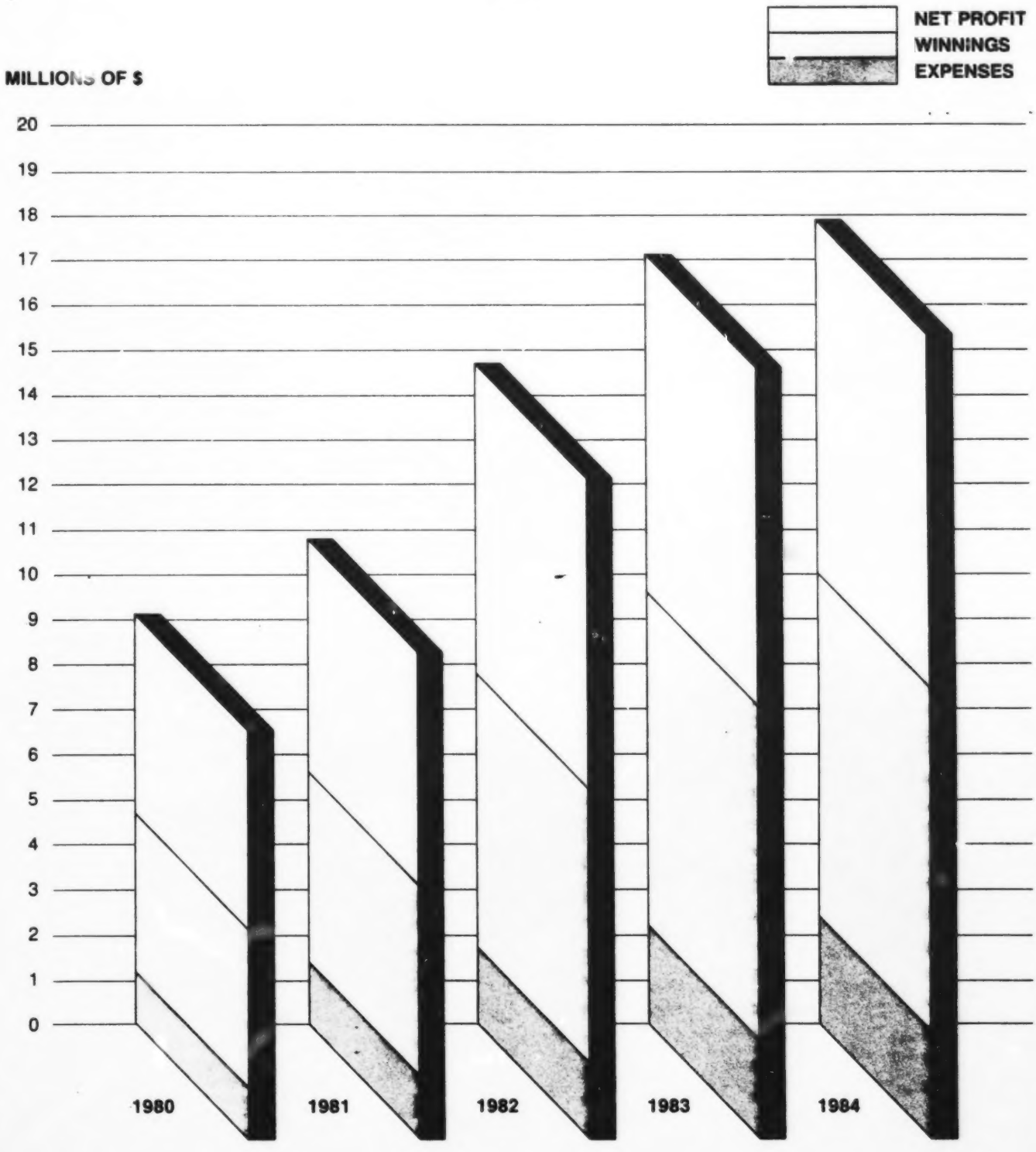
1980-1984



GRAPH 4

Raffles

1980-1984



GRAPH 5

Pull-Tickets

1980-1984